

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

**DECLARATION OF SARA
HENDERSON IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION**

Civil Action No. 1:17-CV-2989-AT

SARA HENDERSON, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Sara Henderson. I am Executive Director of Common Cause Georgia, a non-profit, non-partisan advocacy organization that works to strengthen public participation in our democracy and ensure that public officials and public institutions are accountable and responsive to citizens.

2. I have served as Executive Director of Common Cause Georgia since July 2017. In my role as Executive Director, I work on policy development, legislative outreach, fundraising, and public education on local, state, and national issues that affect every Georgian. In particular, Common Cause Georgia has been focused on working to make Georgia's voting system free, fair, and secure.

3. I submit this Declaration in support of a temporary plan to replace Georgia's electronic voting machines with paper ballots at polling places for the upcoming November 2018 election.

4. Counties would be required to have enough paper ballots available at all precincts needed to serve all eligible voters in the state. And, each precinct would have at least one voting machine for use by voters with disabilities in compliance with current state law.

5. Common Cause Georgia supports this proposal, even though it is a significant change to be made in a short amount of time, for the following reasons.

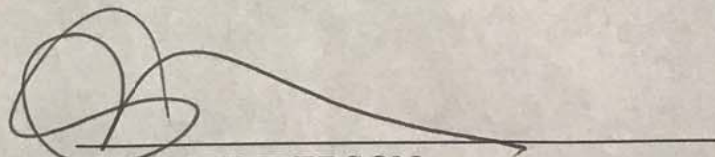
6. First, the use of paperless DREs in Georgia needs to end immediately. Voting machine issues in the State of Georgia are resonating with the common voter because of the recent history of concerns with Georgia's machines being brought to light in national and state media. Additionally, the national discussion of Russian hacking has citizens keenly aware of the risks and vulnerabilities in our systems. Voter confidence is at an all-time low here in Georgia. Would-be voters have told Common Cause they have do not trust the system because of the many known vulnerabilities of Georgia's voting machines. Citizens tell Common Cause Georgia that they want to participate in the system, but they are concerned about

whether or not their vote will count. A switch to paper ballots for this November would help restore much-needed faith in Georgia's election system.

7. Also, to the extent the use of paper ballots and optical scan machines creates wait times on election day, it is worth stating that people are often forced to wait in line when DRE machines go down, which happens not infrequently. After each election, Common Cause Georgia regularly receives upwards of fifty complaints from all over the State of Georgia of at least one machine going down at various precincts. When the machines go down, there are also long lines and voter can wait to cast their ballot in either model.

8. Common Cause Georgia supports a proposed plan to have a sufficient number of paper ballots available at precincts for early and Election-Day voting, and accessible machines for use by voters with disabilities.

Dated: August 20, 2018
Atlanta, Georgia



SARA HENDERSON
EXECUTIVE DIRECTOR
COMMON CAUSE GEORGIA